

ABD/MFD: 2017R00170
JTM 07.07.21

K FILED _____ ENTERED _____
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SEP - 8 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

UNITED STATES OF AMERICA

v.

NANCY GILES,

Defendant

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CRIMINAL NO.

(False Statements in connection with
the Receipt of Federal Employment
Benefits, 18 U.S.C § 1920; Aiding and
Abetting, 18 U.S.C. § 2)

INFORMATION

COUNT ONE

(False Statements in connection with the Receipt of Federal Employment Benefits)

The United States Attorney for the District of Maryland charges that:

Background

1. Defendant NANCY GILES was a resident of Maryland and was employed by the United States Postal Service ("Postal Service") working in Owings Mills, Maryland from 1991 through her retirement in January 2014.

2. Starting in or about February 2008 through in or about December 2017, GILES had been working as a caretaker for at least two elderly female clients and has received payment for services provided to these clients.

The Victim Government Agencies

3. The Office of Workers' Compensation Programs ("OWCP"), U.S. Department of Labor ("Labor Department"), administers benefits program under FECA. Employees of the Postal Service who are disabled due to occupational injury are eligible to receive compensation benefits under this Act.

FECA benefits are paid with monies of the Postal Service.

4. The Labor Department has sole authority to determine if a claimant was entitled to FECA benefits. In this regard, the Labor Department requires claimants to periodically submit reports, known as the OWCP Form EN1032 and Form SSA-581, in order to determine whether disabled employees continue to be eligible to receive benefits under FECA. These forms are sent out to claimants and received from claimants via the U.S. Mail.

5. Each OWCP Form EN1032 requires claimants receiving FECA benefits to report employment, volunteer work, dependents, receipt of other federal benefits, receipt of a third party settlement, convictions of fraud or felony offenses, and correction of personal information (name, address, social security number) for the prior fifteen (15) month benefit period.

6. The Social Security Administration (“SSA”) oversees two programs that benefit persons aged 62 years and over and disabled persons: Disability Insurance Benefits (“DIB”), which is based on prior work, and Title XVI Supplemental Security Income (“SSI”), which is a needs based program.

The Scheme to Defraud

7. Beginning from at least in or about February 2008 and continuing to until in or about December 2017, in the District of Maryland, the defendant, **GILES**, devised and intended to devise a scheme and artifice to defraud and obtain money and property from the Labor Department, the Postal Service, and SSA.

8. It was part of the scheme and artifice to defraud that the defendant, **GILES**, annually submitted OWCP Form EN1032 and Form SSA-581 in 2008 through 2018, and failed to disclose her income from the caretaker services she provided to elderly clients.

9. It was further part of the scheme and artifice to defraud that the defendant, **GILES**, through her misrepresentations as to not having another source of income, caused the Labor Department to issue and

send monies to **GILES** representing FECA benefits every four weeks, and that these misrepresentations were material as **GILES** received an overage of FECA benefits to which she was not entitled.

10. It was further part of the scheme and artifice to defraud that the defendant, **GILES**, provided a false statement to the SSA at the time of her November 2011 appeal/reconsideration application for Disability Insurance Benefits (DIB) in that **GILES** failed to report to SSA in November 2011 that she was receiving Postal Service Worker's Compensation benefits, and that these misrepresentations were material as **GILES** received an overage of DIB benefits to which she was not entitled.

The Charge

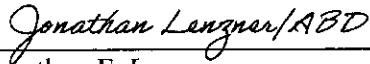
Between in or about February 2008, through in or about January 2017, in the District of Maryland and elsewhere, the defendant,

NANCY GILES,

did knowingly and willfully falsifies, conceals, or covers up a material fact, or makes a false, fictitious, or fraudulent statement or representation, or makes or uses a false statement or report knowing the same to contain any false, fictitious, or fraudulent statement or entry in connection with the application for or receipt of FECA and DIB benefits,.

18 U.S.C. § 1920

18 U.S.C. § 2



Jonathan F. Lenzner
Acting United States Attorney